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Via Electronic Case Filing

April 9, 2018

Hon. Anne Y. Shields
100 Federal Plaza
P.O. Box 830
Central Islip, NY 11722

**Re: *Bibicheff v. Chase Bank USA, N.A.*, No. 2:17-cv-04679 (DRH) (AYS)—
Defendant Chase Bank USA, N.A.’s Unopposed Request to Adjourn
Initial Conference**

Dear Judge Shields:

By this letter motion, Defendant Chase Bank USA, N.A. (“Chase”) respectfully requests to adjourn the initial conference currently scheduled for April 18, 2018. Chase’s counsel has a conflict with appearing in-person on April 18 due to personal and professional obligations in other matters. Counsel for the other parties to this matter consent to this adjournment.

In accordance with Your Honor’s Individual Practice Rules, Chase proposes the following alternative dates for the conference, all of which are acceptable to counsel for the parties:

April 25, 2018 (the parties’ preferred choice)
May 9, 2018
May 11, 2018

This is Chase’s first request for adjournment of the initial conference, and the second overall request for adjournment of the initial conference. The first request for adjournment was made by Plaintiff on January 11, 2018, who asked for adjournment on the ground that “the conference will be more productive if it takes place after Defendant Chase Bank USA, N.A.’s motion to dismiss (ECF No. 28) is decided.” Although Chase’s motion to dismiss is still pending, Plaintiff’s counsel has informed Chase’s counsel that Plaintiff now wishes to proceed with the initial conference but is amenable to continuing the initial conference to a different date to accommodate Chase’s scheduling conflicts.

Respectfully submitted,

/s/ Kathryn Cahoy
Kathryn Cahoy

Attorney for Chase Bank USA, N.A.

cc: all counsel of record via ECF